

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>ZERMATT HOLDINGS, LLC, et al.,</b>	:	Case No. <b>3:23-cv-01423-JJH</b>
	:	
Plaintiffs,	:	
	:	Judge Jeffrey J. Helmick
v.	:	
	:	
<b>MARTIN CHRISTOPHER (“CHRIS”) COOPER, et al.,</b>	:	<b>PLAINTIFFS’ AFFIDAVIT OF JURISDICTION</b>
	:	
Defendants.	:	
	:	

Now comes Plaintiffs Zermatt Holdings, LLC (“Zermatt”) and WFA of San Diego, LLC (“WFASD”) (Zermatt and WFASD are jointly referred to as “Plaintiffs”), by and through the undersigned counsel, and hereby files Plaintiffs’ Affidavit of Jurisdiction. Plaintiffs now assert upon information and belief the following Affidavit:

Respectfully submitted,

/s/ Peter A. Saba  
Peter A. Saba (0055535)  
Jeffrey M. Nye (0082247)  
Joshua M. Smith (0092360)  
STAGNARO, SABA  
& PATTERSON CO., L.P.A.  
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**Attorneys for Plaintiffs**

**AFFIDAVIT OF PETER A. SABA, ESQ.**

STATE OF OHIO                    )  
  ) ss:  
COUNTY OF HAMILTON        )

Now comes Peter A. Saba, Esq., being first sworn and duly cautioned, and hereby states as follows:

1. I am over the age of eighteen (18) and am competent to testify to the facts stated herein.
2. I have personal knowledge of the matters set forth herein.
3. I am serving as personal counsel on behalf of Plaintiffs Zermatt Holdings, LLC and WFA of San Diego, LLC.
4. Plaintiff Zermatt Holdings, LLC (“Zermatt”) is a North Carolina limited liability company.
5. The members of Zermatt are:
  - a. Louis Dworsky, an individual and resident of North Carolina.
  - b. Bill Dworsky, an individual and resident of North Carolina.
  - c. Meyer Dworsky, an individual and resident of Alabama.
  - d. Ralph Thomas Mayes, an individual and resident of Florida.
6. Plaintiff WFA of San Diego, LLC (“WFASD”) is a North Carolina limited liability company.
7. Zermatt is the sole member of WFASD.
8. Defendant Martin Christopher “Chris” Cooper (“Cooper”) is an individual and resident of Toledo, Ohio.
9. Defendant Chris Cooper & Company, Inc. (“CCCI”) is an Ohio corporation and has its principal place of business in Toledo, Ohio.

10. Accordingly, none of the members of Zermatt or WFASD are citizens of the State of Ohio and complete diversity of the parties exists.

FURTHER AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Peter A. Saba, Esq.

Subscribed to and swore before me this 21<sup>st</sup> day of August, 2023.



Jessica Peterson  
Notary Public, State of Ohio  
My Commission Expires:  
June 29, 2026

  
\_\_\_\_\_  
Notary of the State of Ohio

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all counsel of record by operation of the Court's electronic filing system this 21<sup>st</sup> day of August, 2023.

/s/ Peter A. Saba  
Peter A. Saba (0055535)